

Exhibit E

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Donald J.Trump
Granted to Date of previous extension	08/06/2014
Address	725 Fifth Avenue New York, NY 10022 UNITED STATES
Party who filed Extension of time to oppose	DonaldJ.Trump
Relationship to party who filed Extension of time to oppose	ESTTA form was missing a space between first name and middle initial.

Attorney information	James D. Weinberger Fross Zelnick Lehrman & Zissu, P.C. 866 United Nations Plaza 6th Floor New York, NY 10017 UNITED STATES jweinberger@frosszelnick.com, lkittay@frosszelnick.com Phone:(212) 813-5900
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Applicant Information

Application No	86116800	Publication date	04/08/2014
Opposition Filing Date	07/28/2014	Opposition Period Ends	08/06/2014
Applicant	Trump Your Competition, Inc PO Box 4470 Lake Tahoe, NV 89449 UNITED STATES		


Goods/Services Affected by Opposition


Class 035. First Use: 2013/01/01 First Use In Commerce: 2013/01/01 All goods and services in the class are opposed, namely: Advertising and marketing consultancy
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Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
Dilution	Trademark Act section 43(c)


Marks Cited by Opposer as Basis for Opposition


U.S. Registration No.	3391095	Application Date	04/16/2007
Registration Date	03/04/2008	Foreign Priority Date	NONE
Word Mark	TRUMP		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 2004/01/08 First Use In Commerce: 2004/01/08 Entertainment services, namely, ongoing unscripted television programs in the field of business, business disputes, and dispute resolution		


U.S. Registration No.	2991841	Application Date	01/16/2004
Registration Date	09/06/2005	Foreign Priority Date	NONE
Word Mark	TRUMP MODEL MANAGEMENT		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 2003/10/20 First Use In Commerce: 2003/10/20 Model and talent management services		

U.S. Registration No.	2240310	Application Date	08/08/1997
Registration Date	04/20/1999	Foreign Priority Date	NONE

Word Mark	TRUMP
Design Mark	
Description of Mark	NONE
Goods/Services	Class 043. First use: First Use: 1995/06/12 First Use In Commerce: 1995/06/12 hotel services


U.S. Registration No.	3686581	Application Date	05/29/2007
Registration Date	09/22/2009	Foreign Priority Date	NONE
Word Mark	TRUMP ONE		
Design Mark			
Description of Mark	The mark consists of the word "ONE" with the name "TRUMP" located inside the "O" of the word "ONE".		
Goods/Services	Class 035. First use: First Use: 2007/05/29 First Use In Commerce: 2007/05/29 Customer recognition program in the nature of an incentive card for use in hotel, casino and resort facilities		

U.S. Registration No.	2414739	Application Date	06/30/1999
Registration Date	12/19/2000	Foreign Priority Date	NONE
Word Mark	TRUMP CARD		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 1989/06/30 First Use In Commerce: 1989/06/30 customer recognition program in the nature of an incentive card for use in hotel, casino and resort facilities		

U.S. Registration No.	3828734	Application Date	11/19/2007
Registration Date	08/03/2010	Foreign Priority Date	NONE
Word Mark	TRUMP ATTACHÉ#		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 2007/10/00 First Use In Commerce: 2007/10/00 Inventory control, namely, personalized prestocking of kitchens, refrigerators and bars for hotel guests and hotel condominium unit owners</p> <p>Class 037. First use: First Use: 2007/10/00 First Use In Commerce: 2007/10/00 Personal valet services to hotel guests and hotel condominium unit owners, namely, laundry services, pressing of clothing</p> <p>Class 041. First use: First Use: 2007/10/00 First Use In Commerce: 2007/10/00 Personal valet services to hotel guests and hotel condominium unit owners, namely, arranging for ticket reservations for shows and other entertainment events based on customers' individual preferences</p> <p>Class 043. First use: First Use: 2007/10/00 First Use In Commerce: 2007/10/00 Guest services, namely, making reservations and booking for temporary lodging, reservation of restaurants</p> <p>Class 045. First use: First Use: 2007/10/00 First Use In Commerce: 2007/10/00 Personal shopping for others; personal concierge services for others comprising making requested personal arrangements and reservations, running errands and providing information to meet individual needs, all rendered in hotels and residential complexes</p>		

U.S. Registration No.	3483760	Application Date	10/04/2007
Registration Date	08/12/2008	Foreign Priority Date	NONE
Word Mark	TRUMP		
Design Mark			

Description of Mark	NONE
Goods/Services	Class 043. First use: First Use: 2003/11/00 First Use In Commerce: 2003/11/00 Restaurant services

U.S. Registration No.	3566654	Application Date	12/03/2007
Registration Date	01/27/2009	Foreign Priority Date	NONE
Word Mark	TRUMP ENTERTAINMENT RESORTS		
Design Mark			
Description of Mark	The mark consists of the large word "TRUMP", with the smaller words "ENTERTAINMENT RESORTS" underneath.		
Goods/Services	Class 041. First use: First Use: 2005/06/05 First Use In Commerce: 2005/06/05 Casino and nightclub services Class 043. First use: First Use: 2005/06/01 First Use In Commerce: 2005/06/01 Resort lodging, hotel, restaurant and bar services		

U.S. Registration No.	2269568	Application Date	05/23/1997
Registration Date	08/10/1999	Foreign Priority Date	NONE
Word Mark	TRUMP NATIONAL GOLF CLUB		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1997/07/26 First Use In Commerce: 1997/07/26 clothing, namely, [pants, shorts,] shirts, caps, [visors,] blouses, [skirts, slacks,] and jackets Class 041. First use: First Use: 1997/07/26 First Use In Commerce: 1997/07/26 golf club services Class 042. First use: First Use: 1997/07/26 First Use In Commerce: 1997/07/26 social club and restaurant services		

U.S. Registration No.	2226174	Application Date	03/16/1998
Registration Date	02/23/1999	Foreign Priority Date	NONE
Word Mark	TRUMP INTERNATIONAL HOTEL & TOWER		
Design Mark			

Description of Mark	NONE
Goods/Services	<p>Class 016. First use: First Use: 1997/01/15 First Use In Commerce: 1997/01/15 stationery, postcards, note cards, greeting cards</p> <p>Class 025. First use: First Use: 1997/01/15 First Use In Commerce: 1997/01/15 clothing, namely, t-shirts, polo shirts, long-sleeved shirts, caps, shorts, sweat pants, sweat shirts, bathrobes</p> <p>Class 036. First use: First Use: 1997/01/15 First Use In Commerce: 1997/01/15 real estate services, namely, listing, leasing, and managing commercial and residential property</p> <p>Class 042. First use: First Use: 1997/01/15 First Use In Commerce: 1997/01/15 hotel services, restaurant services, and health spa services</p>

Attachments	<p>77157334#TMSN.png(bytes)</p> <p>78352969#TMSN.png(bytes)</p> <p>77192256#TMSN.png(bytes)</p> <p>75739819#TMSN.png(bytes)</p> <p>77333103#TMSN.png(bytes)</p> <p>77295919#TMSN.png(bytes)</p> <p>77342507#TMSN.png(bytes)</p> <p>F1495601.pdf(266363 bytes)</p>
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/s/ James D. Weinberger
Name	James D. Weinberger
Date	07/28/2014

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No. 86/116,800
Published in the *Official Gazette* on April 8, 2014
Mark: TRUMP YOUR COMPETITION

DONALD J. TRUMP,

Opposer,

-against-

TRUMP YOUR COMPETITION, INC.,

Applicant.

NOTICE OF OPPOSITION

Opposer Donald J. Trump believes that he would be damaged by the issuance of a registration for the trademark TRUMP YOUR COMPETITION for “Advertising and marketing consultancy” in Int. Cl. 35, as applied for in Application Serial No. 86/116,800, and therefore opposes the same.

As grounds for the opposition, Opposer, through his counsel Fross Zelnick Lehrman & Zissu, P.C., alleges as follows:

1. Opposer is a world-renowned real estate entrepreneur, business icon and celebrity. Over the years, Opposer has expanded his successful real estate, casino and resort empire throughout the world and has pursued a wide variety of business ventures.

2. For decades, Opposer has used marks consisting of or including TRUMP in commerce in the United States. Opposer also has published bestselling books and has launched many successful businesses associated with his name, including but not limited to TRUMP real estate, hotel and entertainment services, TRUMP MODEL MANAGEMENT model and talent

services, TRUMP ATTACHÉ inventory control services, TRUMP ONE incentive card services, and TRUMP CARD incentive card services.

3. In addition, since 2004, Opposer has produced and starred in the hit NBC television reality show, *The Apprentice*, a series centered on a competition between job applicants in which the applicants are evaluated, selected and hired, based *inter alia* on their ability to advertise and market particular goods and services.

4. As a result of his extensive business activities and public recognition, Opposer's TRUMP name and mark has not only become associated with luxury and prestige, it has become a famous household name and brand.

5. Opposer is the owner of numerous U.S. federal trademark registrations for marks consisting of or including TRUMP for a wide variety of goods and services including, but not limited to, the following:

- TRUMP, U.S. Reg. No. 3,391,095 for "Entertainment services, namely, ongoing unscripted television programs in the field of business, business disputes, and dispute resolution" in Int. Cl. 41, registered on March 4, 2008, based on first use in 2004.
- TRUMP MODEL MANAGEMENT, U.S. Reg. No. 2,991,841, for "Model and talent management services" in Int. Cl. 35, registered on Sept. 6, 2005, based on first use in 2003.
- TRUMP, U.S. Reg. No. 2,240,310 for "hotel services" in Int. Cl. 43, registered on April 20, 1999, based on first use in 1995.
- THE TRUMP ORGANIZATION, U.S. Reg. No. 2,232,052 for "real estate planning, laying out, development and construction services of residential, industrial and commercial properties services" in Int. Cl. 37, registered on March 16, 1999, based on first use in 1964.
- TRUMP ONE (stylized), U.S. Reg. No. 3,686,581, for "Customer recognition program in the nature of an incentive card for use in hotel, casino and resort facilities" in Int. Cl. 35, registered on Sept. 22, 2009, based on first use in 2007.

- TRUMP CARD, U.S. Reg. No. 2,414,739, for “customer recognition program in the nature of an incentive card for use in hotel, casino and resort facilities” in Int. Cl. 35, registered on December 19, 2009, based on first use in 1989.
- TRUMP ATTACHÉ, U.S. Reg. No. 3,828,734, for “Inventory control, namely, personalized prestocking of kitchens, refrigerators and bars for hotel guests and hotel condominium unit owners” in Int. Cl. 35, registered on August 3, 2010, based on first use in 2007.
- TRUMP, U.S. Reg. No. 3,483,760 for “restaurant services” in Int. Cl. 43, registered on August 12, 2008, first use date November 2003.
- TRUMP ENTERTAINMENT RESORTS, U.S. Reg. No. 3,566,654 for, *inter alia*, “Resort lodging, hotel, restaurant and bar services” in Int. Cl. 43, registered on January 27, 2009, first use date June 1, 2005.
- TRUMP NATIONAL GOLF CLUB, U.S. Reg. No. 2,269,568 for, *inter alia*, “social club and restaurant services” in Int. Cl. 42, registered on August 10, 1999, first use date July 26, 1997.
- TRUMP INTERNATIONAL HOTEL & TOWER, U.S. Reg. No. 2,226,174 for, *inter alia*, “restaurant services” in Int. Cl. 42, registered on February 23, 1999, first use date January 15, 1997.

Printouts from the TSDR electronic database records of the U.S. Patent and Trademark Office showing the current status and title of the registrations relied upon herein are attached hereto as Exhibit A. All of these registrations are valid, subsisting and in full force and effect, and constitute evidence of the validity of the marks and of Opposer’s exclusive right to use them in connection with the goods and services identified therein, pursuant to Section 33(b) of the Lanham Act, 15 U.S.C. § 1115(a). Further, Reg. Nos. 3,391,095, 2,991,841, 2,240,310, 2,232,052, 2,414,739, 2,269,568, 2,226,174, 2,269,568 and 2,226,174 have become incontestable under Section 15 of the Lanham Act. 15 U.S.C. § 1065.

6. Upon information and belief, Applicant is a Nevada corporation, with an address of PO Box 4470, Lake Tahoe, Nevada 89449.

7. Applicant has filed an application to register the mark TRUMP YOUR COMPETITION in connection with “Advertising and marketing consultancy” in Int. Cl. 35, Application Serial No. 86/116,800, based on first use on January 1, 2013, pursuant to Section 1(a) of the Lanham Act, 15 U.S.C. § 1051(a).

8. Upon information and belief, Applicant has begun using the mark TRUMP YOUR COMPETITION in connection with the identified goods, as shown here above examples of Opposer’s mark in use in similar formats:



The registration of Applicant’s mark is inconsistent with Opposer’s prior rights and statutory grant of exclusivity of use.

9. Applicant’s mark is identical to Opposer’s famous TRUMP mark and name in sight, sound and overall meaning, except that Applicant appends the descriptive term “your competition” to the end of the mark. Indeed, the term “your competition” exacerbates the likelihood of confusion because customers associate Opposer’s TRUMP mark with competitions, including those weekly and season-long competitions broadcast on *The Apprentice*.

10. Applicant's registration of the TRUMP YOUR COMPETITION mark in connection with the services identified in its application are likely to cause confusion and lead consumers to falsely believe that Applicant's services emanate from or otherwise are sponsored by or affiliated with Opposer, in violation of Section 2(d) of the Lanham Act, 15 U.S.C. §§ 1052(d). By reason of the foregoing, Opposer will be damaged by the registration of the TRUMP YOUR COMPETITION mark.

11. Additionally, because the TRUMP mark and name is famous and became famous prior to any date upon which Applicant can rely, Applicant's registration of the TRUMP YOUR COMPETITION mark will damage Opposer by trading on the enormous goodwill associated with the mark and diluting its distinctiveness. Accordingly, Applicant's registration of the TRUMP YOUR COMPETITION mark violates Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c). By reason of the foregoing, Opposer will be damaged by the registration of the TRUMP YOUR COMPETITION mark.

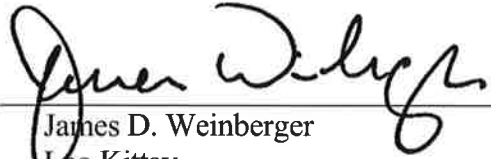
12. Finally, because the TRUMP mark contains the Trump name, Applicant's registration of the TRUMP YOUR COMPETITION mark will damage Opposer by falsely suggesting a connection with persons, living or dead, namely, Donald J. Trump. Accordingly, Applicant's registration of the TRUMP YOUR COMPETITION mark violates Section 2(a) of the Lanham Act, 15 U.S.C. § 1052(a). By reason of the foregoing, Opposer will be damaged by the registration of the TRUMP YOUR COMPETITION mark.

WHEREFORE, Opposer requests that its Notice of Opposition be granted and that Application Serial No. 86/116,800 be denied.

Dated: July 28, 2014
New York, New York

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By:


James D. Weinberger
Leo Kittay

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